

**BELLSOUTH**

Ben G. Almond  
Executive Director-  
Federal Regulatory

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February 4, 1997

Ms. Geraldine Matise  
Federal Communications Commission  
Common Carrier Bureau  
Network Service Division  
1919 M Street, N.W.  
Washington, D.C. 20554

RECEIVED  
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FEDERAL COMMUNICATIONS COMMISSION

Re: *Report and Order*, CC Docket No. 96-128

Dear Ms. Matise:

In the *Report and Order* in the above referenced proceeding, *Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996*, CC Docket No. 96-128, FCC 96-388 (rel. Sept. 20, 1996) ("*Report and Order*"), *errata*, DA 96-1623 (rel. Sept. 27, 1996), *further errata*, DA 96-1666 (rel. Oct. 8, 1996), *on reconsideration*, FCC 96-439 (rel. Nov. 8, 1996), the Commission deregulated all carrier-provided payphone equipment and required local exchange carriers, among other things, to offer a central office coin transmission service to payphone service providers "so [that] competitive payphone providers can offer payphone services using either instrument-implemented 'smart payphones' or 'dumb' payphones that utilize central office coin services." *Report and Order* at para. 146.

Noting that it had already amended its Part 68 rules on prior occasion to accommodate the registration of "instrument- implemented" payphone, the Commission adopted further amendments to facilitate the registration of central-office-implemented "dumb" payphones. *Report and Order* at para. 150. Further, the Commission "grandfather[ed] existing LEC payphones from the our [sic] revised Part 68 requirements," *id.*, but directed incumbent LECs "to submit proposed interconnection requirements to effectuate such interconnection." *Id.*

As BellSouth indicated in its CEI Plan for Payphone Service Providers (filed November 22, 1996), BellSouth began offering a central office coin transmission service, known as SmartLine service, as early as 1993. Prior to that offering, BellSouth published its network disclosure notice for that service, a copy of which is attached. BellSouth's disclosure notice cited

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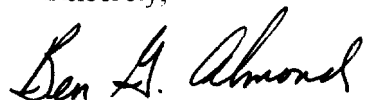
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the specific portions of Bellcore Technical Reference TR-TSY-000456 that contain the electrical characteristics of BellSouth's service offering and indicated minor differences from that reference document peculiar to BellSouth's offering. The disclosure notice also indicated that customer provided payphone equipment could interconnect with BellSouth's SmartLine service via a standard RJ11C jack, but would require a connection to ground external to the network interface to be provided by the customer. BellSouth has been allowing the interconnection of equipment conforming to these criteria with its SmartLine service since it began offering the service.

The criteria referenced in BellSouth's disclosure notice for interconnection of customer provided, central-office-implemented coin payphones are consistent with existing Part 68 registration requirements. In light of this circumstance, coupled with the Commission's grandfathering of existing LEC payphones, BellSouth does not have any further proposal for interconnection requirements to effectuate such interconnection at this time. Of course, should a potential for harm to the network peculiar to such payphones subsequently be identified, BellSouth will work with industry standards organizations and with the Commission to recommend Part 68 modifications as necessary.

Please include this submission with the record of the above referenced proceeding.

Sincerely,

A handwritten signature in black ink, appearing to read "Ben G. Almond". The signature is fluid and cursive, with the first name "Ben" and last name "Almond" clearly legible, and a middle initial "G." in between.

Attachment

cc: Mary Beth Richards  
Linda Dubroof  
William Von Alven  
Ann H. Stevens  
Blaise Scinto



## **EYE ON THE REGIONAL COMPANIES**

### **BELLSOUTH ANNOUNCES COIN CONTROL LINE SERVICE**

BellSouth is planning to offer a network-implemented coin line service. This service will provide features similar to those provided to public telephones owned by BellSouth, including call rating and coin disposition signaling.

Electrical Characteristics of the Network Interface (NI) to this service may be found in the following sections of Bellcore Technical Reference, TR-TSY-000456 *Public Terminals Generic Requirements*:

Section 4.1,  
Sections 4.2.1, 4.2.2, 4.2.3, 4.2.4,  
Section 4.9, and  
Section 5.1.

When the above-mentioned document is used for purposes of describing the interface to BellSouth, references to 2000 Ohms in sections 5.1.2.1 and 5.1.3 should be replaced with 1300 Ohms.

CPE shall interconnect via an RJ11C jack at the NI. It should be noted that, in addition to the two conductors provided through the jack, this service requires a connection to ground. The connection to ground shall be provided, external to the NI, by the customer.

CPE for this type of service is currently being considered for inclusion in the FCC registration program. Depending on the results of that proceeding, interconnected equipment may be subject to requirements beyond those found in the Technical Reference mentioned above.

To order a copy of Technical Reference TR-TSY-000456, please contact:

Bellcore Customer Service  
60 New England Avenue  
Piscataway, NJ 08854-4196  
1-800-521-2673 (within the USA)  
908-699-5800 (outside the USA)

For further information regarding this proposed service offering, please contact:

Ann Butler  
BellSouth Telecommunications  
Room 34T65 Southern Bell Center  
675 W. Peachtree Street, N.E.  
Atlanta, GA 30375  
(404) 529-5866